



Title V Breakout

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MECKLENBURG COUNTY

AIR QUALITY

Title V Topics

- Periodic Review of Existing Rules
- Repeal of Once-In-Always-In Policy
- New Source Review (NSR) Reform
- EPA Title V Task Force Update
- MCAQ GovOnline



Periodic Review of Existing Rules

PROCESS:

- General Statute requires state agencies to review and update rules every 10 years
- State of NC to review approximately 400 rules
- Rules will be updated where necessary, or allowed to expire where practical



NCDAQ Findings

- 320 rules to be readopted by December 31, 2020
- Divided into 6 groups for processing
- Periodic Review of Existing Rules Webpage:
- <http://deq.nc.gov/about/divisions/air-quality/air-quality-rules/periodic-review-existing-rules>



Repeal of Once-In-Always-In Policy

- When potential HAP emissions fall below major source thresholds (due to process changes or enforceable HAP control), major sources can be reclassified as area (non-major) sources.
- May become exempt from MACT rules.
- Reduces regulatory burdens.
- Rewards facilities for investing in emission reductions.
- Could trigger new obligations (Area Source MACT rule 'GACT') or State/Local rules (State Air Toxics)
- Note, EPA has received push back. Likely to be litigated.

<https://www.epa.gov/stationary-sources-air-pollution/reclassification-major-sources-area-sources-under-section-112-clean>



New Source Review Program Reform (PSD / NANSR)

- Significant Impact Levels (SILs) for ozone and fine particulates
- Project Emissions Accounting:

Step 1 – is the project, by itself, a major modification?

Significant Emissions Increase

Clarification on including emissions decreases in this step

Step 2 – Netting

Actual-to-projected-actual test for existing emission units

Actual-to-potential test for new emission units

Hybrid test for multiple types of emission units



NSR Reform Continued...

- Reactivation of previously inactive site.

EPA intends to review it's current 'Reactivation' Policy:

- Current Policy: Site is assumed to be permanently shut down if idle for more than two years, thus considered a 'new' source and is subject to PSD/NSR upon reactivation.
- Proposed Policy: If operator can demonstrate continued intention to restart the facility over the entire time it was idle, facility would not be a 'new' source.

More information on NSR Reform:

- <https://www.epa.gov/nsr>



EPA Title V Task Force

- Title V Program improvements and recommendations.
- Mostly addressed how state and local agencies handle Title V permits and interact with EPA concerning those permits.
- EPA now allows Electronic Notices.
- MCAQ will adopt NCDAQ's e-notice provisions at next MCAPCO revision (expected around October – November 2018).



MCAQ's GovOnline Initiative

Update from Jason Rayfield



GOVONLINE - COMING SOON!

- MCAQ's new online reporting application.
- EPA CROMERR Compliant!
- Working to create reporting options for:
 - Title V Annual Compliance Certifications
 - Annual Reports
 - Federal reports – NSPS, MACT
- Targeting rollout later this year!





Welcome to the MCAQ Online System (GovOnline) for Electronic Notification, Report, and Application Submissions.

GovOnline allows for online form and report submissions with real-time tracking of processing/review status. The system specifically allows users to:

- Establish a user account and manage all your submittals online
- Submit asbestos NESHAP notifications for demolition and renovation activities
- Submit other air quality compliance reports and applications
- Monitor the processing status of your submittals
- Receive e-mail notifications on review results

Presently the system is operational for the asbestos NESHAP notification form. The system will be expanded to include additional forms in the future.

System User Guide: The System User Guide provides instructions on using the System under the Help Menu. You can also access the guide via the link to the right just below the login button.

Facility/Public Login

User name

Password

Login

- [System User Guide](#)
- [Create a new account](#)
- [Forgot your login user name or password?](#)

Release Date: March 07, 2018

Version: 4.0018.0307.21213

GovOnline uses Adobe Reader for some online document viewing. Please click the following link to install Adobe Reader Plug-in software.



GovOnline Website is secured by

Authorize.Net
a CyberSource solution



Questions?

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